

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

DAVID GECHT,)	
)	
Plaintiff,)	
)	
vs.)	No.: 2023 CV 01742
)	
REYNALDO GUEVARA, GERI LYNN)	Hon. Nancy L. Maldonado, District Judge
YANOW, as special representative of)	
the ESTATE OF ERNEST HALVORSEN)	
ALAN PERGANDE, MICHAEL)	
MUZUPAPPA, ROBERT RUTHERFORD,)	
EDWIN DICKINSON, KEVIN ROGERS,)	
as special representative of the ESTATE)	
OF FRANCIS CAPPITELLI, the CITY OF)	
CHICAGO, BRENDAN MAGUIRE,)	
MICHAEL HOOD, and COOK COUNTY,)	
)	
Defendants.		

**DEFENDANTS' JOINT RESPONSE TO PLAINTIFF'S MOTION FOR A FINDING
OF RELATEDNESS AND FOR REASSIGNMENT OF RELATED CASE TO THIS
COURT'S DOCKET**

NOW COME Defendants, through their respective undersigned counsel, and in Defendants' Joint Response to Plaintiff's Motion for a Finding of Relatedness and for Reassignment of Related Case to this Court's Docket, state as follows:

1. Defendants adopt their contemporaneously filed Joint Motion for Consolidation as their response to Plaintiff's Motion for a Finding of Relatedness and for Reassignment of Related Case to this Court's Docket.

WHEREFORE, Defendants respectfully requests this Court grant their Joint Motion for Consolidation and for any other relief this Court deems appropriate or just.

Respectfully submitted,

By: /s/ Misha Itchhaporia

Special Assistant Corporation Counsel
Timothy P. Scahill
Steven B. Borkan
Misha Itchhaporia
Whitney Hutchinson
Molly Boekeloo
Borkan & Scahill, Ltd.
20 S. Clark Street, Suite 1700
Chicago, Illinois 60603
(312) 580-1030
Attorneys for Reynaldo Guevara

By: /s/ Eileen E. Rosen

Special Assistant Corporation Counsel
Eileen E. Rosen
Catherine M. Barber
Theresa Berousek Carney
Austin G. Rahe
Rock Fusco & Connelly, LLC
333 W. Wacker 19th Floor
Chicago, Illinois 60606
(312) 494-1000
Attorneys for Defendant City of Chicago

By: /s/ Josh M. Engquist

Special Assistant Corporation Counsel
James G. Sotos
Josh M. Engquist
Jeffrey R. Kivetz
Allison L. Romelfanger
Elizabeth R. Fleming
Kyle T. Christie
Mark F. Smolens
THE SOTOS LAW FIRM, P.C.
141 W. Jackson Blvd., Suite 1240A
Chicago, IL 60604
Tel: (630) 735-3300
*Attorneys for Defendants Alan Pergande,
Michael Muzupappa, Robert Rutherford,
Edwin Dickinson, Geri Lynn Yanow,
as special representative for Ernest Halvorsen,
deceased, and Kevin Rogers, as special
representative for Francis Cappitelli, deceased.*

By: /s/ Sean O'Callaghan

Sean O'Callaghan
Michael J. Czopkiewicz
O'Mara & O'Callaghan, LLC
230 W. Monroe, Suite 2620
Chicago, IL 60606
(312) 600-5588
*Attorneys for ASA Defendants, Hon. Michael J.
Hood, Brendan McGuire*